

Exhibit Q

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01963
(MEF-MAH)

DECLARATION OF

[REDACTED]

I, [REDACTED], declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge.

1. I am a licensed psychologist with expertise in cultural psychology, trauma and minority mental health. I submit this declaration in support of Mahmoud Khalil's motion for a preliminary injunction. In particular, I seek to offer evidence regarding a question I understand is under the Court's review: whether the invocation of the determination of Secretary of State Rubio that Mr. Khalil should be arrested, detained and removed from this country because of allegations that his advocacy for Palestinian human rights would cause Mr. Khalil "irreparable harm." Based on my experience and a review of relevant clinical literature, I conclude that it would be reasonable to presume Mr. Khalil would likely experience "irreparable harm."

2. As I detail below, even within a broader context of rising Islamophobia and anti-Arab and anti-Palestinian sentiment and discrimination in this country, the recent and dramatic escalation of charges that activism for Palestinian human rights is somehow (and falsely) the equivalent of antisemitism is itself a reflection of Islamophobia and anti-Palestinian bias. Particularly when lodged against already marginalized Arabs and Palestinians in this country, such a conflation ultimately depends on the problematic stereotyping of Palestinians and Arabs, who are deemed incapable of invoking universalist calls for justice and the vocabulary of international human rights without also coming from a place of violence or hatred.
3. Mr. Khalil, a prominent and well-respected leader in the Palestinian human rights movement in this country has been derided – at the highest levels of the United States government – and without evidence or substantiation as a dangerous “anti-semite” and someone who is a supporter of Hamas. Essentializing his activism as a form of antisemitic hatred or terrorism suggests that Islamophobia and anti-Palestinian animus is operating at the highest levels of government and accordingly being disseminated via his high-profile case, across the country and the world.
4. The social science literature predicts – and amply supports – that such forms of Islamophobia and anti-Palestinian bias, could result in stigmatic harms, injury to identity and other forms of psychological pain that are not, the literature suggests, easily remediated.

BACKGROUND AND QUALIFICATIONS

5. As an [REDACTED], and with the majority of my research over the last decade has focused on the experiences of Arab, Middle Eastern, and North African (MENA) Americans with special attention to discrimination, racial trauma, psychological well-being, and ethnic identity development, I am qualified to offer my expert opinion on the way in which Mr. Khalil has been targeted by the administration would produce distinctive harms to a Muslim, Palestinian like Mr. Khalil.
6. I received my Ph.D. [REDACTED]
[REDACTED]
7. Additionally, I have published numerous first-author manuscripts in high-impact peer-reviewed psychology journals, [REDACTED]
[REDACTED] including studies focused on resilience among trauma-exposed Syrian refugees, perceived discrimination among

Arab Americans, and more recently, the intergenerational transmission of trauma among Arab/MENA families in the U.S.

CHARGES OF ANTI SEMITISM

8. Given the prominence of Mr. Khalil's case in the media, as well as wide reporting about other similarly situated students who have been apprehended and detained by ICE and subject to deportation pursuant to the Secretary of State's Determination, I have an understanding of the basic facts surrounding Mr. Khalil's case. As I understand the facts of this case, Mr. Khalil, a Syrian national of Palestinian ancestry, was a graduate student pursuing a degree at Columbia University. On campus, he became a prominent advocate and spokesperson for Palestinian human rights, and a strong critic of Israel's military campaign in Gaza and the support he believed the United States government and Columbia University itself provided to Israel's military campaign, which international courts of law and international human rights organizations have determined is an ongoing genocide.
9. I understand that the legal authority claimed to arrest and detain and deport Mr. Khalil is Secretary of State Rubio's Determination, that "the activities and presence" of Mr. Khalil in the United States "would have potentially serious adverse policy consequences," which the Secretary based on a conclusion that the protests Mr. Khalil were engaged in were "antisemitic" and "disruptive" such that his continued presence would "undermine U.S. policy to combat anti-Semitism around the world and in the United States, in addition to efforts to protect Jewish students from harassment and violence in the United States." Mr. Khalil is not accused of committing any crime, causing any acts of violence or posing any physical danger or harm to anyone. Instead, the entirety of his detention and attempted deportation rests on a claim that his Palestinian human rights activism is "anti-semitic."
10. Even more, he has been smeared as a supporter of terrorism at the highest levels of the United States government. President Trump described Mr. Mahmoud Khalil as a "Radical Foreign Pro-Hamas Student on the campus of Columbia University" (Second Amended Complaint, ¶73), the official page of the administration accused Mr. Khalil of "[leading] activities aligned to Hamas" (SAC ¶74), and Press Secretary Karoline Leavitt accused Mr. Khalil of "siding with terrorists" (SAC ¶79) when responding to questions about his arrest. Additionally, on March 9, 2025, the White House posted on X/Twitter a mocking and threatening post that centered Mr. Khalil's photograph with "Shalom Mahmoud" and the White House logo just below Mr. Khalil's face. The text of the tweet

stated, “We will find, apprehend, and deport these terrorist sympathizers from our country — never to return again.”¹ (SAC ¶8).

11. Additionally, the current administration has accused Mr. Khalil of espousing antisemitic views, with Secretary of State Marco Rubio noting during a press conference “if you tell us that you are in favor of a group like this [Hamas], and if you tell us . . . I intend to come to your country as a student, and rile up all kinds of anti-Jewish . . . anti-Semitic activities,” and “if you end up having a green card . . . we’re going to kick you out” (SAC ¶80).
12. News outlets have engaged in similar negative portrayals, with one FOX news segment describing Mr. Khalil as a head of an organization that harasses, attempts to intimidate, and doxes Jewish and non-Jewish staff & students - describing Mr. Khalil specifically as a “wolf that is trying to dress up as a sheep”², and other news segments portraying Mr. Khalil as a pro-Hamas sympathizer and a violent actor.³
13. Accordingly, Mr. Khalil’s activism and his cries for justice and safety of his people, as well as his invocation of international human rights laws to support his position that the gravest human rights violations are occurring in Gaza and throughout Palestine have been erased, in favor of a flattened, caricatured assertion that such views have no merit on their own terms, but are rather anti-Semitic and aligned with terrorism.
14. This erasure of Mr. Khalil’s actual arguments – rooted as they appear to be in claims of justice and law – in favor of these well-worn tropes themselves reflect Islamophobia and anti-Palestinian bias insofar as they lean on a presumption that Arab-initiated calls for justice can only come from a place of hatred or sympathy for violence and terrorism.
15. Mr. Khalil, thus, has been broadly publicly pilloried and silenced – indeed arrested, detained and possibly deported – through these well-worn anti-Palestinian and

¹The White House [@WhiteHouse]. (2025, March 9). X. <https://x.com/WhiteHouse/status/1899155922842161597>.

² Fox and Friends (April, 2025). *Columbia professor rips activist Mahmoud Khalil for 'lying to American public'* [Video]. Fox News. <https://www.foxnews.com/video/6371173098112>.

³ Azerrad, E. (2025, March 13). *Deporting Hamas Supporters Like Mahmoud Khalil Is Perfectly Legal*. City Journal. <https://www.city-journal.org/article/columbia-student-mahmoud-khalil-hamas-deport-legal>; I24 News (April, 2025). *U.S. immigration judge rules pro-Hamas Columbia activist Mahmoud Khalil can be deported* [Video]. <https://www.i24news.tv/en/news/international/americas/artc-u-s-immigration-judge-rules-pro-hamas-columbia-activist-mahmoud-khalil-can-be-deported>.

Islamophobic tropes.

CLINICAL LITERATURE DOCUMENTING HARMS OF ANTI-ARAB/ANTI-PALESTINIAN BIAS AND ISLAMOPHOBIA

16. My review of the clinical literature on the effects of Islamophobia and anti-Arab/Palestinian bias and targeting suggests a consistent correlation with targeting of these populations and serious social and psychological harm. That literature would suggest that Mr. Khalil – arguably the biggest and most severely criticized Palestinian individual targeted in this country, is feeling the predictive negative consequences from his targeting.

Methodology

17. A systematic search was conducted using databases such as PsyINFO, PubMed, and Google Scholar to identify relevant literature on the topics of anti-Arab prejudice, anti-Palestinian racism, and Islamophobia. Keywords included “Arab American,” “discrimination,” “anti-Palestinian racism,” “Islamophobia,” “trauma,” “mental health”, and “psychological distress”. Only peer-reviewed articles, published books, and official reports were included.
18. A cursory search examining the impact of public misrepresentation and humiliation was also conducted, with focus on relevant empirical literature on the mental health consequences of these experiences.

Summary of Findings

19. The negative image of Arabs has been manipulated in various political contexts, historically speaking, and is being used and amplified today in the rhetoric surrounding figures like Mr. Mahmoud Khalil. In his activism for Palestine on the campus of Columbia University, rather than being recognized as a peace maker and diplomat, Mr. Khalil has been repeatedly branded in the media and by the highest-level officials of the U.S. government as antisemitic and in support of terrorists, reinforcing the patterns identified in the literature. This harmful stereotyping has built upon by authoritarian ideologies – a social science term detailed **post** – that are awakened in times around incidents perceived as terrorist attacks, and during the 2016 U.S. Presidential Election where Donald Trump’s rhetoric echoed these authoritarian sentiments,⁴ particularly when considering his policies targeting Arab

⁴ Choma, B. L., & Hanoch, Y. (2017). Cognitive ability and authoritarianism: Understanding support

and Muslim populations.

20. Researchers have identified right-wing authoritarianism⁵ (“RWA”)⁶ and social dominance orientation⁷ (“SDO”)⁸ as reasons for the rise in anti-Arab prejudice, upon which the administration’s latest actions rest. Increases in prejudice towards Arabs has been observed in individuals who were more conservative and reactionary following news of Islamic terrorist attacks⁹ and greater implicit and explicit anti-Arab sentiments were also observed in those with higher RWA, particularly authoritarian aggression.¹⁰ In one investigation, the authors urge that “it is important for political leaders to avoid aggressive language when referring to Arab countries or persons. By utilizing such aggressive language, political leaders could unintentionally increase aggressive ideologies held specifically toward Arabs, including Arab Americans”.¹¹
21. The anti-Arab and anti-Muslim discrimination that Mr. Khalil is currently facing by both political figures and the media could reasonably impact his mental health and wellbeing, based on evidence showing a relationship between experiences of discrimination and depression and anxiety. Additionally, the misrepresentation of Mr. Khalil’s character in the media could reasonably contribute to perceived public humiliation, which has been associated with emotional distress, anxiety, depression,

for Trump and Clinton. *Personality and Individual Differences*, 106, 287–291.

<https://doi.org/10.1016/j.paid.2016.10.054>.

⁵ RWA includes three core concepts: submission to authority, adherence to traditional norms, and aggression toward those seen as nonconforming.

⁶ Altemeyer, B. 1981. *Right-wing authoritarianism*. Winnipeg, Canada: University of Manitoba Press.

⁷ SDO refers to the tendency of individuals to organize their experience of the world into ingroups and outgroups, where they believe their own ingroup is superior to outgroups.

⁸ Pratto, F., Sidanius, J., Stallworth, L.M., & Malle, B. F. (1994). Social dominance orientation: A personality variable predicting social and political attitudes. *Journal of Personality and Social Psychology*, 67, 741–763.

⁹ Echebarria-Echabe, Agustin and Emilia Fernandez-Guede. 2006. Effects of terrorism on attitudes and ideological orientation. *European Journal of Social Psychology*, 36(2):259–65.

¹⁰ Awad, G. H., & Hall-Clark, B. N. (2009). Impact of religiosity and right wing authoritarianism on prejudice towards Middle Easterners. *Beliefs and Values: Understanding the Global Implications of Human Nature*, 1, 183–192; Johnson, M. K., Labouff, J. P., Rowatt, W. C., Patock-Peckham, J. A., & Carlisle, R. D. (2012). Facets of right-wing authoritarianism mediate the relationship between religious fundamentalism and attitudes toward Arabs and African Americans. *Journal for the Scientific Study of Religion*, 51, 128 –142. <http://dx.doi.org/10.1111/j.1468-5906.2011.01622.x>.

¹¹ Johnson, M. K., Labouff, J. P., Rowatt, W. C., Patock-Peckham, J. A., & Carlisle, R. D. (2012). Facets of right-wing authoritarianism mediate the relationship between religious fundamentalism and attitudes toward Arabs and African Americans. *Journal for the Scientific Study of Religion*, 51, 128 – 142. <http://dx.doi.org/10.1111/j.1468-5906.2011.01622.x>

posttraumatic stress symptoms, and suicidal thoughts.¹²

22. Accusations of terrorism and alignment with terrorist groups is also common, and has a long history, in anti-Palestinian rhetoric specifically.¹³ Suleiman conducted a longitudinal study of American news coverage of the Arab Israeli conflicts across several years (1956, 1967, and 1973) and observed how the negatively stereotyped Arab was weaponized to increase public support for Israel.¹⁴ Stockton found that these negative images of Arabs only worsened after the Arab Israeli war in 1967 and continued in the early 1990's to promote American involvement in the first Persian Gulf War.¹⁵
23. Unique to anti-Palestinian prejudice, accusations of antisemitism when advocating for Palestinian human rights have been categorized as a form of racial gaslighting experienced by Palestinians.¹⁶ The Arab Canadian Lawyers Association has defined anti-Palestinian racism as a form of racism that “silences, excludes, erases, stereotypes, defames, or dehumanizes Palestinians or their narratives”.¹⁷ The Institute for the Understanding of Anti-Palestinian Racism (IUAPR), in consultation with the Arab Canadian Lawyers Association released a report on November 19, 2024, that summarized findings from their national survey investigating anti-Palestinian racism in the U.S. from March through April, 2024 and its impact on both Palestinians and non-Palestinians.¹⁸ The major findings from the report were as follows:
- A. 63.4% of participants reported experiencing “silencing, exclusion, harassment, physical threat of harm, or defamation while advocating for Gaza and/or Palestinian human rights”¹⁹

¹² Li, W. W., Heward, C., Merrick, A., Astridge, B., & Leow, T. (2024). Prevalence of experiencing public humiliation and its effects on victims' mental health: A systematic review and meta-analysis. *Journal of Pacific Rim Psychology*, 18.

¹³ Schotten, C. H. (2024). Zionism and the war (s) on terror: extinction phobias, anti-Muslim racism, and critical scholarship. *Critical Studies on Terrorism*, 17(4), 996-1018.

¹⁴ Suleiman, Michael. (1988). *The Arabs in the mind of America*. Brattleboro, Vt.: Amana Books.

¹⁵ Stockton, Ronald. (1994). Ethnic archetypes and the Arab image. In E. McCarus (Ed.), *The development of Arab-American identity* (pp. 119-153). Michigan: The University of Michigan Press.

¹⁶ Abu-Laban, Y., & Bakan, A. B. (2022). Anti-Palestinian racism and racial gaslighting. *The Political Quarterly*, 93(3), 508-516.

¹⁷ Majid D. “Anti-Palestinian Racism: Naming, Framing, and Manifestations.” Arab Canadian Lawyers Association, April 2022.

¹⁸ Zuberi, A., Zuberi, Z., Saud, L., Rimawi, L., Biskup, T., McMagon, E.L., Valdez, P., & Ghannam, J. (2024). *Anti-Palestinian racism survey additional findings report 2024: Student and educator data*. The Institute for the Understanding of Anti-Palestinian Racism.

¹⁹ Ibid at 4.

- B. 82.4% of participants reported “experiencing harm to mental or physical health at least once or twice due to experiencing or witnessing anti-Palestinians racism”²⁰
- C. When sampling schools and academic institutions, “74% of students and 75% of educators experienced silencing, exclusion, harassment, physical threat or harm, and defamation while advocating for Gaza and/or Palestinian human rights”²¹
- D. 60% of students and 61% of educators “were afraid to speak out about what is happening to Palestinians in Gaza or for Palestinian human rights in general”²²
24. The survey highlights a significant pattern of fear, silencing, and psychological and physical harm among individuals advocating for Palestinian rights, particularly within educational settings,²³ with some arguing that self-censorship is likely related to fears of being accused of antisemitism.²⁴ Given these consequences and other material consequences (e.g., loss of job opportunities, etc.), avoidance in engaging in discussion about Palestine may lead to feelings of alienation, particularly for those who identify as Palestinian, Arab, or Muslim American. If this is the baseline fear of any Palestinian activist, it is reasonable to assume that Mr. Khalil – a primary target of high-level officials in this administration – feels this particularly acutely.
25. With regards to the consequences of experienced anti-Arab prejudice, there has been a growing body of psychological literature that has examined how anti-Arab discrimination and Islamophobia have impacted the health and well-being of this population. In one study with a predominantly Muslim sample of youth, findings showed that greater exposure to negative media portrayals of Muslims was associated with lower psychological well-being, leading to heightened feelings of exclusion and alienation.²⁵ In a sample of 279 Arab Americans, experiences of discrimination were related to greater levels of depression and anxiety, after

²⁰ Ibid.

²¹ Ibid.

²² Ibid at 8.

²³ Telhami, S., Lynch, M., & Langlois, K. (2023, November). *Critical Issues Poll: Middle East Scholar Barometer*. <https://criticalissues.umd.edu/>.

²⁴ Fassin, D. (2024). The rhetoric of denial: Contribution to an archive of the debate about mass violence in Gaza. *Journal of Genocide Research*, 1–7.

²⁵ Dari, T., Saleem, M., Nassar, S., & Abou-Dahech, H. (2024). Ethnic identity, negative media portrayal, and psychological well-being in Arab-American youth: Mediation analysis. *Journal of Multicultural Counseling and Development*, 52(4), 273-284.

accounting for differences related to age, biological sex, and residency status. In this same sample, greater levels of discrimination were also associated with higher likelihood of regarding one's own physical health as fair or poor (instead of good or excellent).²⁶ In another study exploring the effects of discrimination following September 9/11 attacks in 1016 Arab Americans, findings showed that experiences of overt discrimination towards self or family members (e.g., verbal insults, threatening words, physical attacks related to ethnic identity) and feeling not respected in broader American society were related to greater psychological distress.²⁷ And finally, in yet another sample of Middle Eastern/Arab American adults, ethnic discrimination was significantly related to greater psychological distress.²⁸ While a burgeoning area of research, findings provide support for the notion that exposure to anti-Arab and anti-Muslim discrimination is associated with psychological distress.

26. Unique ramifications of experiencing anti-Palestinian racism specifically have seldom been investigated in empirical work. That said, the impact of public misrepresentation and humiliation on mental health has been investigated. Given public accusations against Mr. Khalil of supporting terrorism and espousing antisemitic views, I feel this area of literature is relevant to the case. With regards to public humiliation, in a recent systematic review and meta-analysis of 33 different studies (with a total sample size of over 40,000 individuals), the authors found a significant negative impact of public humiliation on mental health, with studies noting symptoms of anxiety, depression, emotional distress, posttraumatic stress symptoms, and suicidal thoughts.²⁹ One study in particular found that the negative effects of humiliation on participants were particularly pronounced when individuals felt that values that were more central to their self-concept were attacked and denigrated.³⁰

²⁶ Kader, F., Bazzi, L., Khoja, L., Hassan, F., & de Leon, C. M. (2020). Perceived discrimination and mental well-being in Arab Americans from southeast Michigan: A cross-sectional study. *Journal of racial and ethnic health disparities*, 7, 436-445.

²⁷ Padela, A. I., & Heisler, M. (2010). The association of perceived abuse and discrimination after September 11, 2001, with psychological distress, level of happiness, and health status among Arab Americans. *American journal of public health*, 100(2), 284-291.

²⁸ Ikizler, A. S., & Szymanski, D. M. (2018). Discrimination, religious and cultural factors, and Middle Eastern/Arab Americans' psychological distress. *Journal of Clinical Psychology*, 74(7), 1219-1233.

²⁹ Li, W. W., Heward, C., Merrick, A., Astridge, B., & Leow, T. (2024). Prevalence of experiencing public humiliation and its effects on victims' mental health: A systematic review and meta-analysis. *Journal of Pacific Rim Psychology*, 18.

³⁰ Mann, L., Feddes, A. R., Leiser, A., Doosje, B., & Fischer, A. H. (2017). When is humiliation more intense? The role of audience laughter and threats to the self. *Frontiers in Psychology*, 8, 495.

27. There is a distinct harm here also of a distortion of Mr. Khalil's avowed identity. While Mr. Khalil is being accused by public officials of supporting terrorism and espousing antisemitic views, he has described himself in the following way in a 2024 CNN interview: "As a Palestinian student, I believe that the liberation of the Palestinian people and the Jewish people are intertwined and go hand-by-hand and you cannot achieve one without the other".³¹ As such, the current administration's misrepresentation of a presumably central component of Mr. Khalil's character could be psychologically damaging. While the majority of these studies have focused on public humiliation in "offline" spaces (e.g., a school setting), it is presumed that the impact of humiliation in the digital age is even more far reaching – as victims of public humiliation and misrepresentation can never truly escape the witnessed and humiliating experience as a result of the permanency of online content. In a published dissertation focused specifically on the lived experience impact of humiliation and misrepresentation in the media (MHM) in the digital age, research showed that MHM was associated with heightened traumatic symptoms and suicidal thoughts and with participants noting that their respective experiences with MHM were uniquely traumatic and were life-changing in many negative ways, including materially and psychologically.³²
28. The findings presented from the literature in this report demonstrate a troubling picture of how negative stereotypes and prejudicial attitudes towards Arab Americans, Palestinians, and Muslims contribute to a climate of silencing and psychological harm. The stereotypes about Arabs, especially men, as violent, radical, and terrorist-supporting have been ongoing for decades and as such, have been ingrained in American media and political rhetoric, further fueling discriminatory attitudes. The negative image of Arabs has been manipulated in various political contexts, historically speaking, and is being used and amplified today in the rhetoric surrounding figures like Mr. Mahmoud Khalil.
29. The perpetuation of negative stereotypes, coupled with the deployment of antisemitism allegations in response to Palestinian advocacy, creates a climate where

³¹ Bailey, C. (2025, March 11). *Who is Mahmoud Khalil? Palestinian activist detained by ICE over Columbia University protests*. CNN. <https://www.cnn.com/2025/03/11/us/mahmoud-khalil-columbia-ice-green-card-hnk/index.html>.

³² Marie, C. (2020). *The Traumatic Impact of Media Humiliation, Misrepresentation and Victim-Shaming on Narrative Identity and Well-Being*. (Publication No. 27961901). [Doctoral Dissertation, Fielding Graduate University]. ProQuest Dissertations & Theses. *See also* Marie, C. (2013-2022). *The Traumatic Impact of Media Misrepresentation & Public Shaming*. The Amplifier Magazine: Society for Media Psychology and Technology. Division 46 of the American Psychological Association. <https://div46amplifier.com/2021/12/13/the-traumatic-impact-of-media-misrepresentation-public-shaming/>.

individuals are often silenced, harassed, or targeted when speaking up for Palestine. Data from recent surveys and reports highlight the pervasive fear among Palestinians and their allies, particularly in educational and professional settings, to speak out on these issues, resulting in a tendency to engage in self-censorship. Such experiences of marginalization are related to heightened psychological distress, with evidence linking experiences of discrimination and racism to increased rates of anxiety, depression, and poor self-reported physical health among Arab Americans.

30. Mr. Khalil, as one of the most prominent Palestinian activists, has been subjected to the full weight of these politically driven and media disseminated stereotypes and tropes. I have not had the opportunity to conduct an assessment of Mr. Khalil, however based on the literature documenting the harms of such identity-distortions, and based on my professional experience, they have the potential to significantly harm him psychologically.

Dated: June 3, 2025

[REDACTED]

Signed:

/s/

[REDACTED]